

#E1-695  
RH

February 20, 2004

Surface Transportation Board  
Case Control Unit  
1925 K Street, NW  
Washington, DC 20423



Attention: Rini Ghosh

Re: STB Finance Docket No. 34284

Dear Ms. Ghosh:

Because of Vulcan Materials Company's very good environmental record, the rural location for the proposed rail line and the company's demonstrated social responsibility, the Schweers Historical Foundation concurred with the STB's October decision to require of the company a Cultural Resources Assessment. We are disappointed that a small, but vocal, group of Medina County citizens have succeeded in further delaying the Medina Project and making it so controversial that the STB must now require an Environmental Impact Statement. We offer here our comments on the STB's proposed scoping notice, with which we concur.

The Schweers Historical Foundation is a beneficiary of Vulcan's commitment to social responsibility. When purchasing land for the rail right-of-way, the company obtained two, old historic, rock homes built by German immigrants. Descendants of the homes original owners met with Vulcan intending to buy the homes if possible. Vulcan agreed to give the homes to a 501(c)(3) corporation formed by family members. From the very beginning, Vulcan assured us that the homes would be ours regardless of the eventual outcome of the Medina Project.

To consider our support for Vulcan a quid pro quo, as some have suggested, is to underestimate our original concerns about the quarry and railroad and our ability to learn about the mining process and what the impact on the area Vulcan's Medina Project might have. After numerous visits to Vulcan, research into the company's history and record, we are convinced Vulcan goes to great lengths to minimize negative impacts and strives to promote the advantages its activities will have on the environment, wildlife and human community. We believe that the proposed scope of the EIS is adequately described in the STB's proposed scoping notice and that no further studies are warranted. We offer our views below on each area identified in the scoping notice.

#### **Impact Categories Pertaining to the Rail Line Construction and Operation**

1. **Transportation and Traffic Safety.** The lightly populated rural area, consisting of farmland and pasture, traversed by the rail line precludes disruption of any major transportation arteries. A manifold increase in truck traffic on the narrow county roads has the potential to adversely impact driving safety more than a short rail line. Until the uplands of the limestone escarpment are reached nearer the quarry site, the

land along the rail line is flat. Well maintained tracks, the gradually sloping grade and the slow speed of the train indicate to me that derailment worries are of low priority. Visibility is good at the proposed roadway crossing sites for the rail line. With the addition of warning signs, lights and crossing-arm barriers, I believe it unlikely that train/vehicle collisions will occur. A hundred-car train, approximately a mile long, traveling at 20 miles per hour will take about 3 minutes to pass through the roadway crossing site. With the expectation that only two train trips a day will occur, initially, the closing time for the road will be only 12 minutes in a 24 hour day. When train traffic increases, perhaps Vulcan could schedule the train departures and returns during low traffic times.

2. **Public Health and Worker Health and Safety.** I would expect Vulcan to hire a rail construction company of good repute and possessing of a construction safety record commensurate with industry standards for both worker and public safety. Well sign-posted potential hazards such as ditches or parked equipment and night-time caution-lights where needed during construction, would greatly reduce unsafe situations. Fencing of the right-of-way, rail road signs, warning signals with flashing lights and barrier-arms at grade crossings, as well as proper maintenance of tracks and trains will make the operation of the trains as safe as any endeavor of this kind.
3. **Water Resources.** In the vicinity of the rail line, there are two subsurface water sources, the Edwards Aquifer and the Carrizo Sand Aquifer. I believe the surface soil disruption for creation and operation of the rail bed will not interfere with the recharge, flow or seepage of these aquifers. The Preliminary Cultural Resources Assessment Report by STB and its choice of route quite adequately address the question of the creeks, wetlands and their watersheds traversed by the proposed rail line. Near the SHFs property, Vulcan would build a trestle to cross the dry portion of the Quihi Creek. The trestle's location is east of the Quihi Creek wetlands and small lake formed by a spring in a limestone depression. To suggest the track bed will create flooded areas, as the Medina County Environmental Action Association has done, is to beg the question, "Why would geologists, engineers and VMC build tracks in a location that requires constant flood damage-control of its own equipment?"
4. **Biological Resources.** For several years, Vulcan has been working in concert with local, state and federal officials to conduct a study of the area's native plants, animal life and their habitats. A review of Vulcan's environmental record confirms that the company is an excellent steward of all phases of the environment in which it operates.
5. **Air Quality Impacts.** SHFs concern about air-borne limestone dust was greatly lessened when we learned of Vulcan's washing process to remove dust particles from the crushed stone before loading it in the rail cars. The movement of rail line construction equipment along the county's graveled roads will create a greater problem with dust. The roads could be dampened to prevent some of the dust. With the infusion of tax dollars into the county coffers, perhaps some of the graveled roads can be paved, thus reducing the amount of existing dust, and thereby, raising the air quality.
6. **Geology and Soils.** From its southern point on the UP Railroad, the seven miles of rail spur will cross sandy loam of limestone and dark waxy clays overlaying gravel beds of the Rio Grande Plains and encounter the Balcones Escarpment. This limestone upland is a dividing feature between the farming region in the south and the Hill Country ranch and hunting land of the Edwards Plateau in the north. The Balcones Escarpment and the Edwards Plateau are extensive geological features covering or running through most of central Texas. They are traversed by major

interstate highways, numerous other roadways, most of Texas's major rivers and many communities. By comparison, the impact, the SGRs seven miles of single track will have on the geological features, will be minimal. Erosion that might occur in some areas along the track can be prevented by supplemental planting of native grasses and shrubs.

7. **Land Use.** The rail line will travel through farm and/or ranchland throughout its length. Where possible, I believe Vulcan proposes to place the easement along property boundary lines to leave intact the areas of cultivation and pasturage. Land already leased and cleared for a gas pipeline could provide for additional right-of-way. VMC owns land that part of the track will cover; other property owners have leased right-of-way to the company. I can see very little negative impact the rail line will have on the land it travels through.
8. **Environmental Justice.** The communities of Dunlay and Quihi and the city of Hondo are made up of descendants of the German and Alsatian immigrants who settled this area in the mid 1800s. Mexican-Americans are the largest minority making up more than 40% of the population. There are few Black residents. To my knowledge, none live in the area where the proposed rail line is to run. Because of the national down-turn in the economy, coupled with the low income associated with small family farms and ranches and a general lack of jobs, many in the area could be considered in the low-income group. The infusion of money into the area in the form of wages, taxes and charitable contributions would be a considerable boon to the residents.
9. **Noise.** By city standards, rural areas are not noisy places. The advantages, attendant upon the development of the railroad, far out-weigh the occasional sounds of the railcars moving along the tracks. If the train's engines, cars and tracks are well maintained, the noise should be minimal. When sounds become familiar, they tend to fade into the background.
10. **Vibration.** The STB's Section of Environmental Analysis undertook a vibration study. We do not believe that this issue warrants further study.
11. **Recreation and Visual Resources.** To my knowledge, only hunting leases, and a gun club provide recreational opportunities near the proposed route of the rail line. The SHFs vision for a small historical park surrounding the William and Henry homes is far into the future. The beauty of the undeveloped ranchland, the hills and the occasional sighting of wildlife are enjoyable to many. I can not imagine that a narrow, one-line railroad, duly obscured by the trees and brush that flourish along fence rows, will even be noticed except when the train passes by.
12. **Cultural Resources.** The STBs Preliminary Cultural Resources Assessment, completed in October 2003, does an excellent job of generally describing the area's cultural resources. We understand that the Texas Historical Commission will play a role in any further assessment of cultural resources impacts.
13. **Socioeconomics.** The STBs proposed route for the SGR will take it close to two tiny Texas communities, Dunlay and Quihi. These communities do not have the population to sustain their own post offices, or their own school systems. The populations consist of farmers and ranchers actively pursuing agri-business, retired individuals and others who commute to nearby towns to work. The new rail line and the quarry it serves would not adversely impact minority or a low-income group. Quite to the contrary, it would provide jobs for the people, taxes to the schools and county and additional income to churches, merchants and others providing services in the communities.
14. **Cumulative and Indirect Impacts.** Hondo is not on my 1879 map of Medina County. The railroads, the Galveston, Harrisburg and San Antonio Railway and the

International and Great Northern Railroad arrived in the county in 1881 and 1882, respectively. Castroville turned down the opportunity to have the GH&SA pass through its town. Hondo was built on the GH&SA and soon grew into the county's major distribution center. By 1892, the county seat was moved from Castroville to Hondo and the city prospered. I do not believe the SGR will turn Quihi into the county seat; but, it will bring a measure of prosperity to the area that is not likely to arrive in any other form, anytime soon. So as not to lose the rural nature of the area that is so appealing to its inhabitants, I suggest planning for improved prosperity and population growth. Plans to upgrade roadways, manage subdivision development, rethink regulations of water-well and septic systems should be considered. County government should expect to increase fire and police protection and to expand health facilities.

In conclusion, Medina County covers 1,331 square miles; the proposed single rail-line will traverse only seven linear miles of its rural and partly undeveloped pasture-land. While fewer than a hundred residents actively oppose the quarry and rail-line, there are approximately 40,000 county residents. The majority of whom will benefit from the much needed economic boost of new jobs, additional taxes to improve the school system, upgraded roadways in part of the county and many other social and charitable advantages of having a large, international company at work in the community.

Sincerely,



Carol Carpenter  
President, (2003-2004)  
Schweers Historical Foundation

cc:     The Hon. John Cornyn, U.S. Senator  
          The Hon. Henry Bonilla, U.S. Representative, 23<sup>rd</sup> District  
          The Hon. Frank L. Madla, Texas State Senator, District 19  
          The Hon. Timeteo Garza, Texas State Representative, District 80  
          Mr. Bill Martin, Texas Historical Commission